

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTY-SECOND SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

## INFORMATION REQUESTS

- ATT-VZ 22-1. For each input sourced to “Product Management” in Workpaper Part C-1 of the cost study filed by Verizon in this proceeding and dated May 4, 2001 (and discussed in Verizon’s response to ATT-VZ 4-1), and for each of the inputs provided in Attachment 2 to Verizon’s response to ATT-VZ 12-17, please provide the following:
- (a) Please specify the date that each of the above input values was originally provided to Verizon’s Service Costs organization.
- (b) Please specify which of these inputs were used in previous cost studies or proceedings in the last ten years by Verizon-Massachusetts, Bell Atlantic-Massachusetts, NYNEX, or New England Telephone. Please identify the cost study and proceeding. For any inputs used in a previous cost study and/or proceeding, please list the inputs that used a different value from the one used in this cost study and specify the previous value.
- ATT-VZ 22-2. Attachment 2 to Verizon’s response to ATT-VZ 4-16 provides summary DCPR data used by Verizon to develop its Engineer, Furnish & Install factor for digital switches. Please provide the detailed DCPR data that underlie the summary 1998 data for Massachusetts only for both Hardwired equipment (Attachment 2, page 1, line 3) and Plug-In equipment (Attachment 2, page 2, line 3).
- ATT-VZ 22-3. Verizon’s answer to ATT-VZ 12-18 regarding penetration ratios was not responsive, perhaps because the original question was not sufficiently clear. The key information sought in this request but missing from Verizon’s response is the following: For each vertical service deployed in Massachusetts by Verizon (e.g, 3-way calling), please list the number of lines (or trunks, as appropriate) on which the feature is being provided to the customer, and the actual penetration ratio for that feature (number of lines or trunks with feature compared to total lines or trunks). Please specify the time or period covered by the response.

Respectfully submitted,

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